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LETTER REGARDING REGULATORY REVIEW AND APPROVAL WITH MODIFICATIONS ON  
DRAFT PLAN REMOVAL AND UPGRADE OF UNDERGROUND STORAGE TANKS AND  
INTERIM REMEDIAL ACTION AT THE GOLF COURSE MAINTENANCE YARD NAS FORT  
WORTH TX  
2/6/1996  
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



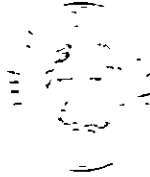
**NAVAL AIR STATION  
FORT WORTH JRB  
CARSWELL FIELD  
TEXAS**

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**ADMINISTRATIVE RECORD  
COVER SHEET**

AR File Number 678

Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Dan Pearson, *Executive Director*



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## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

February 6, 1996

Mr. Charles A. Rice  
Team Chief  
Base Closure Restoration Division  
Air Force Center for Environmental Excellence  
8001 Inner Circle Drive, Suite 2  
Brooks AFB, Texas 78235-5328

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Re: Naval Air Station Ft. Worth JRB/Carswell AFB (NAS Ft. Worth)  
TNRCC Solid Waste Registration No. 65004  
EPA ID NO. TX0571924042  
Hazardous Waste Permit No. 50289  
Draft Plan - Removal/Upgrade of Underground Storage Tanks and Interim Remedial  
Action at the Golf Course Maintenance Yard at NAS JRB Ft. Worth  
Revisions to Approval with Modifications Letter Dated January 29, 1996

### Revisions to Approval with Modifications

Dear Mr. Rice:

The Texas Natural Resource Conservation Commission (TNRCC) Corrective Action staff received an e-mail entitled Issues with UST/Golf Course Work Plan from the Air Force Center for Environmental Excellence (AFCEE), dated January 25, 1996. The e-mail's list of three issues was provided in response to the TNRCC's January 29, 1996, Approval with Modifications for the above referenced Draft Plan. AFCEE's comments and our response are enumerated below.

1. Work Plan Comment 3 - Appendix IX - *Do all Appendix IX constituents need to be analyzed? Historical use of Golf Course maintenance yard indicates the storage of pesticides and herbicides, and hydrocarbons (gasoline and motor oil) for maintenance vehicles. The analytical suite proposed (pesticides, herbicides, TPH, metals) will detect all of the above. If required, we can add SW8240 for volatile organic compounds (VOCs) and SW8270 for semivolatile organic compounds (SVOCs), with the list of analytes as shown in the QAPP. These methods will detect VOCs and SVOCs associated with hydrocarbons. Again, based on historical usage, it should not be necessary to analyze for dioxins, cyanide, sulfide, or*

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*mercury, as well as for some of the more "exotic" VOCs and SVOCs. The cost for a complete Appendix IX analysis will be approximately twice as much per sample as the total for SW8080, SW8150, SW8240, SW8270, SW6010, E418.1, and SW7060 for arsenic.*

Carswell must analyze for mercury because of its use as a fungicide ingredient. Otherwise, it is acceptable to add EPA Methods 8240 (VOC) and 8270 (SVOC) in lieu of an entire Appendix IX analysis. Our approval of an abbreviated analyte list does not extend to other corrective activities on NAS Ft. Worth/Carswell Air Force Base and must be requested as site specific conditions warrant.

*2. Work Plan Comment 4, QAPP Comment 4, Waste Characterization - Soils removed from the Golf Course Maintenance Yard will be characterized by the soil sampling proposed. The analytical results will provide the concentrations of any contaminants present. [We] Request that this be deemed sufficient to meet the requirements of 30 TAC 335, Subchapter R, Section 335.504 (2)(B), which permits classification of waste based on "applying knowledge of the hazardous characteristic of the waste in light of the materials or process used." The analytical results of the soil samples will provide the information needed, and further characterization should not be required.*

We disagree that Carswell has sufficient knowledge of the materials or processes used at the site to characterize the wastes until the site investigation is complete and the constituents of concern are determined. We also disagree that the analytical methods originally proposed in the Work plan are sufficient to characterize any waste, although the addition of Analytical Methods 8240, 8270, and 7470 will suffice. Any constituents not included in the approved list of parameters can be deleted from Subchapter R characterization.

*3 QAPP Comment 5, PQLs - This project only plans to sample soils, not groundwater. The water samples shown in the planning documents are field quality control samples such as trip blanks and equipment rinse blanks. [We] Request that Appendix IX PQLs not be applied to soil sampling.*

*The Texas Risk Reduction Standard 2 Medium-Specific Concentration Standards (30 TAC 335.568, Appendix II) allows the soil PQLs proposed. All soil PQLs proposed in the QAPP meet the MSCs for soil [under] either residential or industrial exposure with the exception of arsenic. Arsenic will be analyzed using method SW6010. Please advise if this is acceptable.*

We agree that Practical Quantitation Limits (PQLs) meant for water and groundwater analyses cannot be expected for soils. However, at a minimum, the soil PQLs must be accurate enough to quantify concentrations at or below the soil Media Specific Concentrations (MSC) for Risk Reduction Standard 2 Residential Soil-to-Groundwater Cross Media Protection (GWP-Res), or

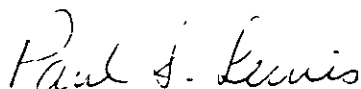
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the Soil MSC (SAI-Res), **whichever is lower**. Please refer to 30 Texas Administrative Code §335.568, Appendix II. The Table 7.2.15-1 in the Work Plan lists soil PQLs in excess of these MSCs for antimony, arsenic, cadmium, lead, nickel, selenium, and silver. This discussion assumes that background concentrations are less than the PQLs.

Please submit within 90 days a revised Plan that reflects all the modifications contained in our January 29, 1996, Approval with Modifications letter, as amended herein.

If you have any questions or need further assistance with this matter, please contact Mr. Geoffrey Meyer in the Corrective Action Section in Austin at (512) 239-2577, mail code MC127, or Internet address gmeyer@smtpgate.tnrc.state.tx.us.

Sincerely,



Paul S. Lewis, Manager  
Corrective Action Section

PL/GM

cc: Joel Sanders, Southern Division, Naval Facilities Engineering Command, P.O. Box 190010, North Charleston, SC 29419-9010  
Stacy Gent, Department Head, Environmental Department/Code110, Department of the Navy, Building 1215, NAS JRB Ft. Worth, Texas 76127-6200  
Ohlen Long, P.E., AFBCA, 6550 White Settlement Road, Ft. Worth, Texas 76114-3520  
Judith Black, USEPA Region 6

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**ADMINISTRATIVE RECORD**

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